

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in compliance with D.N.J. LBR 9004-1(b)	
HILL WALLACK LLP Elizabeth K. Holdren, Esq. 21 Roszel Road P.O. Box 5226 Princeton, NJ 08543 Phone: 609-924-0808 Email: eholdren@hillwallack.com <i>Attorneys for Carrington Mortgage Services, LLC</i>	
In Re: Bruce A. Piekarsky Debtor.	Chapter: 13 Case No.: 22-10450 Judge: Rosemary Gambardella, U.S.B.J. Hearing: March 1, 2023 at 10:00AM

**NOTICE OF MOTION FOR AN ORDER GRANTING RELIEF
FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY**

To: Jeanne A. Naughton, Clerk
Martin Luther King, Jr. Federal
Building
50 Walnut Street
Newark, NJ 07102

Marie-Ann Greenberg
Chapter 13 Standing Trustee
30 Two Bridges Road
Suite 330
Fairfield, NJ 07004-1550
Trustee

David L. Stevens
Scura, Wigfield, Heyer & Stevens
1599 Hamburg Turnpike
Wayne, NJ 07470
Debtor's Attorney

Bruce A. Piekarsky
250 George Rd., Apt. 8J
Cliffside Park, NJ 07010
Debtor

Debra Piekarsky
250 George Rd., Apt. 8J
Cliffside Park, NJ 07010
and
9129 SW 20th Place
Davie, FL 33324
Co-Debtor

PLEASE TAKE NOTICE, that on March 1, 2023 at 10:00 a.m., or as soon thereafter as counsel may be heard, Hill Wallack LLP, attorneys for Carrington Mortgage Services, LLC (“Movant”), shall move before the Honorable Rosemary Gambardella, U.S.B.J., at the Martin Luther King, Jr. Federal Building, 50 Walnut Street, Courtroom 3E, Newark, New Jersey 07102, for an Order granting Movant relief from the automatic stay with respect to the debtor, Bruce A. Piekarsky (“Debtor”) pursuant to Section 362(d)(1) of the Bankruptcy Code and relief from co-debtor stay with respect to co-debtor, Debra Piekarsky (“Co-Debtor”) pursuant to Section 1301(c) with respect to real property located at 9129 SW 20th Place, Davie, FL 33324 (the "Property"), on which Movant holds a Mortgage; and

PLEASE TAKE FURTHER NOTICE, that Movant shall rely upon the Certification of Creditor Regarding Post Petition Payment History (Note and Mortgage) in support of its Motion; and

PLEASE TAKE FURTHER NOTICE, that Movant further requests an order providing that all communications sent by Secured Creditor in connection with proceeding against the property including, but not limited to, notices required by state law and communications to offer and provide information with regard to a potential Forbearance Agreement, Loan Modification, Refinance Agreement, Loss Mitigation Agreement, or other Loan Workout, may be sent directly to Debtor; and

PLEASE TAKE FURTHER NOTICE, that in accordance with LBR 9013-1(a) and LBR 9013-4, a proposed form of Order is submitted herewith and in accordance with LBR 9013-3(d), this motion will be decided on the papers unless opposition is filed.

HILL WALLACK LLP
Attorneys for Movant

By: /s/ Elizabeth K. Holdren
Elizabeth K. Holdren

Dated: February 6, 2023